Dec 18, 2023, 10:05 am Lucy H. Carrillo, Clerk of Court

AO 91 (Rev. 11/11) Criminal Complaint

UNIT	TED STATES DIS	STRICT COURT		
SEALED	for the		FILED IN THE UNITED STATES DISTRICT COURT DISTRICT OF HAWAII	
BY ORDER OF THE COURT	District of Haw	vaii	Dec 14, 2023 Lucy H. Carrillo, Clerk of Court	
United States of Americ	ea)		Lucy H. Carrillo, Clerk of Court	
v,)	Case No.		
KALANA LIMKIN)	MJ 23-01733-	RT	
)			
		FILED UNDER SEAL PURSUANT TO CRIMLR5.2(a)(1)		
Defendant(s)		CRIM	LK5.2(a)(1)	
	CRIMINAL CO	MPLAINT		
I, the complainant in this case,	state that the following is	true to the best of my know	wledge and belief.	
On or about the date(s) of De	ecember 13, 2023	in the county of	Hawaii in the	
District of	Hawaii , the defe	endant(s) violated:		
Code Section		Offense Description		
18 U.S.C. § 2252(a)(2)	Receipt, Distribution and	d Possession of Child Porn	ography	
This criminal complaint is bas See attached affidavit.	ed on these facts:			
✓ Continued on the attached :	sheet			
E continued on the attached s	sheet.		4	
		The state of the s	n. Mujake	
			inant's signature	
			FBI Task Force Officer d name and title	
Sworn to under oath before me telepho		Trines	· nume and title	
acknowledged pursuant to Fed.R.Crin	I.F. 4.1(0)(2).	THE DISTRICT		
Date: 12/14/2023	É		Ohu lada	
City and state: Honole	ulu, Hawaii		Rom A. Trader	
STAY INTO STATE			United States Magistrate Judg	
		THE OF HAME	0	

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,

Plaintiff,

Mag. No. 23-01733-RT

VS.

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

KALANA LIMKIN,

UNDER SEAL

Defendant.

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn telephonically, state the following is true and correct to the best of my knowledge and belief:

Introduction

1. I am a Special Agent/Task Force Officer assigned to the Federal Bureau Of Investigation Honolulu Division Joint Terrorism Task Force ("JTTF") and have been with the U.S. Army Criminal Investigation Division ("CID") since September 2022. Prior to my employment with CID, I was a Special Agent with the Naval Criminal Investigative Service ("NCIS") since January 2003. My responsibilities as an FBI Task Force Officer and CID Special Agent include, but are not limited to, the investigation of domestic and international terrorism. I have experience conducting investigations related to counterintelligence, child

pornography, child abuse, homicide, narcotics, fraud, wrongful destruction, and sexual assault. I have investigated criminal violations relating to child exploitation and child pornography including violations pertaining to the illegal production, distribution, receipt, and possession of child pornography. I have utilized court authorized search warrants, subpoenas, conducted physical surveillance, and utilized confidential informants and interviewed subjects and witnesses. I have received advanced training on the conduct of international terrorism investigations, counterintelligence investigations, and general crimes investigations. Since 2003, I have been assigned to the FBI JTTF, FBI Honolulu Counterintelligence squad, NCISRA Lemoore, CA, NCISRU USS JOHN C. STENNIS, and NCISFO Northwest. Due to my training and experience as a CID Special Agent, I am familiar with the United States Criminal Code and the Uniform Code of Military Justice. In past investigations, I have used court-authorized search warrants for the installation of tracking devices on vehicles to assist physical surveillance, determine patterns of life, and observe criminal activity. In past criminal investigations, I have executed search warrants that resulted in valuable physical and digital evidence collection, seized assets, and numerous subjects agreeing to cooperate with the government. I have completed basic and advanced law enforcement training courses at the Federal Law Enforcement Training Center at Brunswick, GA, Federal Bureau of Investigation Training Academy at Quantico,

VA, and Joint Counterintelligence Training Academy at Quantico, VA. I have also worked with other federal agents and law enforcement officers who have investigated these crimes and they have shared their knowledge and experience regarding the receipt, distribution, or possession of child pornography.

Furthermore, as a Task Force Officer with the FBI, I am an investigative or law enforcement officer of the United States with the meaning of Section 2510(7) of Title 18 United States Code and empowered by law to conduct investigations of and to make arrests for the offenses enumerated in Section 2516 of Title 18, United States Code. Through my training and experience, I have become familiar with the manner in which criminal offenders operate, and the efforts of those involved in such activities.

- 2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement agents. This affidavit is intended to show merely that there is sufficient probable cause for the requested Complaint and offense and does not set forth all of my knowledge about this matter. I have set forth only the facts that I believe are necessary to establish probable cause to support the requested Complaint.
- 3. This affidavit is made in support of a criminal complaint against LIMKIN, for the possession of child pornography within the District of Hawaii on or about December 13, 2023, in violation of Title 18, United States Code, Section

2252(a)(2). That section makes it a crime to knowingly receive, distribute, or possess child pornography that has been mailed, shipped, or transported in interstate or foreign commerce by any means, including by computer.

PROBABLE CAUSE

- 4. In May 2023, FBI Honolulu opened an investigation on LIMKIN, who was previously identified as an individual involved in the solicitation of child pornography and self-harm imagery from self-identified minors. LIMKIN was an associate of the groups known as "CVLT" and "764" and identified as the founder of the splinter group, "Cultist", which focused on more specific behaviors, such as promoting child pornography, child exploitation, sexual extortion, and trafficking, doxing, swatting, "fed'ing," manipulation, animal cruelty and self-harm of minors. Doxing is the action or process of searching for and publishing private or identifying information about a particular individual on the internet, typically with malicious intent. Swatting is the action or practice of making a call to emergency services in an attempt to bring about the dispatch of a large number of armed police officers to a particular address. Fed'ing is similar to swatting but relates more specifically to the dispatch of federal law enforcement.
- 5. Members of the group "764" have conspired and continue to conspire in both online and in-person venues to engage in violent actions in furtherance of a Racially Motivated Violent Extremist ideology, wholly or in part through activities

that violate federal criminal law meeting the statutory definition of Domestic Terrorism, defined in Title 18, United States Code, § 2331 (5).

- 6. LIMKIN was identified in numerous Internet Crimes Against Children (ICAC) Cyber Tipline Reports, where he uploaded multiple child pornography image files, IMG_20230318_144030_853.jpg, IMG_20230318_144048_121.jpg, IMG_20230318_144036_902.jpg, IMG_20230318_144046_156.jpg, IMG_20230318_144043_462.jpg.
- 7. IMG_20230318_144030_853.jpg is a color image depicting a prepubescent female child, based on a complete absence of pubic hair and a diminutive body size comparative to the adult male, with her legs spread apart, laying on a burgundy background, possibly a sheet. The word, "Rape" is written in black colored ink on the female child's abdomen. The adult male's hand is holding his erect penis as it penetrates the female child's labia. The image also contains the text, "I luv u Holly" superimposed on the lower right corner of the image.
- 8. IMG_20230318_144048_121.jpg is a color image depicting a fully nude prepubescent female child, based on a complete absence of pubic hair, bent over from the waist, and fully exposing her vagina and anus. The female child appears to be on a bed that has white colored bedding and a pink colored blanket. The female child's face, which is blurred, is between her legs looking behind her in the direction of the camera. A device resembling a digital thermometer is inserted

into the female child's anus. An adult's fingers are visible on the back of the female child's knee.

- 9. IMG_20230318_144036_902.jpg is the same image as IMG_20230318_144030_853.jpg.
- 10. IMG_20230318_144046_156.jpg is a color image depicting a fully nude prepubescent female child, based on a complete absence of pubic hair and a lack of breast development, laying back on a bed with white colored bedding and a pink colored blanket that contains blue, pink, and polka dot flowers. The female child's legs are fully spread apart, exposing her vagina and anus. There is a device resembling a digital thermometer inserted into the female child's anus. The female child's face is blurred.
- 11. IMG_20230318_144043_462.jpg is a color image depicting a prepubescent female toddler, based on child-like facial features and a diminutive body size comparative to an adult male's hand. The female toddler is nude from the waist down and laying on her left side on a bed that has a striped blue, tan, and orange colored comforter and a blue colored blanket. The female toddler is wearing a pink long sleeve shirt. The adult male appears to be sitting next to the female toddler on the bed, crossing his legs, wearing dark blue colored pants. His

hand is resting on the female toddler's right side. A long device, resembling a thermometer with a red cap and bulb is inserted into the female toddler's anus.

- at the Children's Justice Center of Oahu by a Child/Adolescent Forensic
 Interviewer (CAFI). MV first met LIMKIN through Omeagle, which connected
 her to his Discord server, "Cultist." LIMKIN shared his screen and showed MV
 child pornography of a 5 year old girl being raped. LIMKIN had rules for MV and
 would make girls cut his name into their body and had a collage of pictures of it.
 LIMKIN reportedly talked to other minor females and asked for nude photographs
 every two hours and commented that "the younger [the females], the better."

 LIMKIN asked MV for photographs of herself in her underwear. LIMKIN was on
 4Chan, which is an internet messaging board where users can post content
 anonymously, and posted child pornography so MV reported him. LIMKIN would
 also post Nazi and child pornography memes in his Discord server.
- executed a federal search warrant, Mag. No. 23-01723-RT, at

 Hilo, HI , residence of LIMKIN. LIMKIN was detained for safety and subsequently interviewed by your affiant and Special Agent Kelly

 Mayne with the Internet Crimes Against Children (ICAC) Task Force Hawaii.

 LIMKIN was advised of his rights according to *Miranda* and voluntarily agreed to

be interviewed. During the interview, LIMKIN admitted to being the creator of "Cultist," an online splinter group of "764" that engaged in criminal activities to promote self-harm, cutting "fan signs" into bodies, and receipt, production, and distribution of child pornography. LIMKIN admitted to asking minor females to send him nude photographs of themselves and receiving child pornography links and images via his Discord server, "Cultist." LIMKIN also admitted to being in possession of child pornography files, which were contained on an Android G7 cellular phone, in his vehicle, a White Chevrolet pickup truck, Hawaii license plate #ZGT-007.

Conclusion of the Affiant

15. WHEREFORE, based on the aforementioned facts and my training and experience, respectfully submit that there is probable cause to conclude

KALANA LIMKIN committed the offense of possession of child pornography in violation of 18 U.S.C. §§ 2252(a)(2).

Request for Sealing

16. It is respectfully requested that the Complaint and Affidavit			
attached to the Complaint and Warrant for Arrest be sealed. I believe that			
sealing these documents is necessary because they relate to an ongoing			
investigation into criminal organizations and not all of the targets of this			
investigation will be arrested at this time. Based upon my training and			
experience, I have learned that online criminals actively search for criminal			
affidavits and arrest warrants via the Internet, and disseminate them to other			
online criminals as they deem appropriate, i.e., post them publicly online			
through the carding forums. Premature disclosure of the contents of this			
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affidavit and related documents may have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.

> Kare M. Myske Kara Miyake

Task Force Officer, FBI

This Criminal Complaint and Affidavit in support thereof were presented to, approved by, and probable cause to believe that the defendant above-named committed the charged crime(s) found to exist by the undersigned Judicial Officer at 3:33 p.m. on December 14, 2023, at Honolulu, Hawaii.

Sworn to under oath before me telephonically, and attestation acknowledged pursuant to Fed. R. Crim. P. 4.l(b)(2), this 14th day of December, 2023, at Honolulu, Hawaii.

SUNTES DISTRICTOR

Rom A. Trader

United States Magistrate Judge

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